

FILED
6/30/2020 10:50 AM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY IL
2020L006882

JUAN A. SIFUENTES,)
Plaintiff,)
v.) Case No. 2020L006882
ALY A. AHMED and K1 LOGISTICS,)
INC.,)
Defendants.)

COMPLAINT AT LAW

NOW COMES the Plaintiff, JUAN A. SIFUENTES, by his attorneys, O'Brien Law LLC, and for his Complaint at Law against the Defendants, ALY A. AHMED and K1 LOGISTICS, INC., states as follows:

COUNT I – ALY A. AHMED

1. On or about August 6, 2019, ALY A. AHMED operated a 2013 Freightliner Truck in a westerly direction on the Interstate 90 westbound ramp at or near Arlington Heights Road in Elk Grove Township, Cook County, Illinois.
2. On or about August 6, 2019, JUAN A. SIFUENTES ("SIFUENTES") operated a 2008 Dodge Caravan in a westerly direction on the Interstate 90 westbound ramp at or near Arlington Heights Road in Elk Grove Township, Cook County, Illinois.
3. At all times relevant, JUAN A. SIFUENTES was stopped due to stopped traffic in front of him and was acting with due care for his own safety.
4. At all times relevant, ALY A. AHMED had a duty to operate his truck with due care for the safety of others on the roadway, including SIFUENTES.

5. In violation of the aforesaid duty, ALY A. AHMED was guilty of one or more of the following negligent acts and/or omissions:

- a. Chose not to obey traffic laws which resulted in the collision and injuries of SIFUENTES;
- b. Chose not to keep a proper lookout for other vehicles on the roadway, including SIFUENTES;
- c. Chose not to maintain proper and sufficient control over said vehicle so as to avoid striking other vehicles and persons, in particular SIFUENTES;
- d. Chose not to sound his horn or provide audible warning to SIFUENTES;
- e. Chose to travel at a rate of speed which was greater than reasonable and proper with regard to traffic conditions and the use of the highway, and which endangered the safety of others, in violation of 625 ILCS 5/11-601;
- f. Chose not to reduce the speed of his vehicle as was necessary to avoid colliding with another vehicle on the highway, in violation of 625 ILCS 5/11-601(a);
- g. Chose to follow another vehicle more closely than was reasonable and prudent, given the speed of said vehicle and the traffic upon and condition of the roadway, in violation of 625 ILCS 5/11-710(a).

6. As a direct and proximate result of one or more of the foregoing negligent acts and/or omissions, the vehicle driven by ALY A. AHMED struck the rear of the vehicle driven by JUAN A. SIFUENTES, thereby causing SIFUENTES to suffer severe, permanent, painful, disabling and disfiguring injuries, which have interfered with and will continue to interfere with his everyday activities and have caused him to incur and will cause him in the future to incur medical expenses.

WHEREFORE, the Plaintiff, JUAN A. SIFUENTES, prays that this Court enter judgment in his favor and against Defendant, ALY A. AHMED, for an amount in excess of \$50,000.00, plus costs.

COUNT II – K1 LOGISTICS, INC.

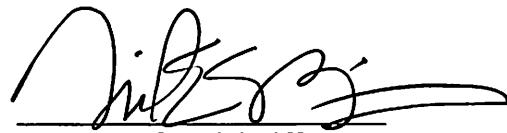
1. JUAN A. SIFUENTES repeats and realleges paragraphs one through six of Count I of his Complaint at Law as and for paragraphs one through six of Count II, as if fully set forth herein.

7. At all times relevant, K1 LOGISTICS, INC. was the owner of the 2013 Freightliner truck being operated by ALY A. AHMED.

8. At all times relevant, K1 LOGISTICS, INC. was the employer of ALY A. AHMED.

9. At all times relevant, ALY A. AHMED was operating said vehicle in the course of his employment with, or otherwise for the benefit of, K1 LOGISTICS, INC.

WHEREFORE, the Plaintiff, JUAN A. SIFUENTES, prays that this Court enter judgment in his favor and against Defendant, K1 LOGISTICS, INC., for an amount in excess of \$50,000.00, plus costs.

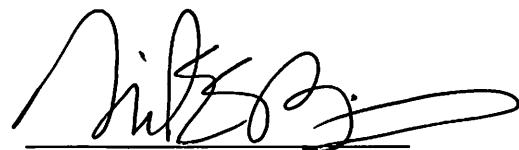


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SUPREME COURT RULE 222(b) ATTORNEY'S AFFIDAVIT

I, Daniel E. O'Brien, represent Plaintiff and state that, to the best of my knowledge and belief, there is a good faith basis to confirm that the damages in this lawsuit exceed \$50,000.00.



Daniel E. O'Brien

Subscribed and sworn to me
this 30th day of June, 2020.

